



Samuel J. Wellborn  
Associate General Counsel

Duke Energy  
1201 Main Street  
Suite 1180  
Columbia, SC 29201

o: 803.988.7130  
f: 803.988.7123

sam.wellborn@duke-energy.com

November 2, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk and Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia SC 29210

Re: **Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Establish a Consolidated Informational Docket for Review and Consideration of Grid Improvement Plans (NDI Opened Pursuant to Commission Order No. 2020-533)  
PSC Docket ND-2020-28-E**

**Motion To Withdraw Heather Shirley Smith as Counsel of Record and Substitute Samuel J. Wellborn as Counsel of Record For Duke Energy Carolinas, LLC And Duke Energy Progress, LLC**

Dear Ms. Boyd:

Enclosed for filing please find a Motion To Withdraw Heather Shirley Smith as Counsel of Record and Substitute Samuel J. Wellborn as Counsel of Record For Duke Energy Carolinas, LLC And Duke Energy Progress, LLC in regard to the above captioned matter.

By copy of this letter, I am serving all parties of record via electronic mail.

Kind regards,

Sam Wellborn

Enclosure

cc: Parties of record (via electronic mail)

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. ND-2020-28-E**

**In the Matter of:**

**Joint Petition of Duke Energy  
Carolinas, LLC and Duke Energy  
Progress, LLC to Establish a  
Consolidated Informational Docket  
for Review and Consideration of  
Grid Improvement Plans (NDI  
Opened Pursuant to Commission  
Order No. 2020-533)**

**MOTION TO WITHDRAW  
HEATHER SHIRLEY SMITH  
AS COUNSEL OF RECORD AND  
SUBSTITUTE SAMUEL J. WELLBORN  
AS COUNSEL OF RECORD FOR  
DUKE ENERGY CAROLINAS, LLC AND  
DUKE ENERGY PROGRESS, LLC**

**MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, the “Companies”) hereby move to withdraw Heather Shirley Smith, Deputy General Counsel for Duke Energy Corporation as counsel for the Companies in the above-referenced dockets, and substitute Samuel J. Wellborn, Associate General Counsel for Duke Energy Corporation, as counsel for the Companies in the above-referenced dockets. Accordingly, the Companies request that the service list for the above-referenced dockets be updated to reflect this change.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC pray that Heather Shirley Smith be permitted to withdraw as counsel for the Companies and Samuel J. Wellborn be permitted to substitute as counsel for the Companies effective November 1, 2021.

Respectfully submitted this 2<sup>nd</sup> day of November, 2021.

*Heather Shirley Smith*

---

Heather Shirley Smith  
Duke Energy Corporation  
40 West Broad Street, Suite 690  
Greenville, SC 29601  
(864) 370.5045  
E-mail: [heather.smith@duke-energy.com](mailto:heather.smith@duke-energy.com)

*Samuel J. Wellborn*

---

Samuel J. Wellborn  
Associate General Counsel  
1201 Main Street, Suite 1180  
Columbia, SC 39201  
(803) 988.7130  
Email: [sam.wellborn@duke-energy.com](mailto:sam.wellborn@duke-energy.com)

*Counsel for Duke Energy Carolinas, LLC  
and Duke Energy Progress, LLC*